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**From:** Henning, Alan  
**To:** Wu, Jennifer; Croxton, Dave  
**Sent:** 1/6/2015 6:08:14 PM  
**Subject:** RE: Pesticides section in write-up

My edits are included.

**From:** Wu, Jennifer  
**Sent:** Tuesday, January 06, 2015 2:33 PM  
**To:** Croxton, Dave; Henning, Alan  
**Subject:** Pesticides section in write-up

Hi Dave and Alan,

Just FYI, here's the pesticides section. If you both send me your changes before 4pm, I can combine them. I also caught some inconsistencies re: similar language, but will wait until I get both of your comments before I make any changes.

1. **Spray Buffers for Aerial Application of Herbicides on Non-Fish Bearing Streams: regulatory and/or voluntary approaches that could be established**

- Current Deficiencies/Deficiencies: Oregon does not have a spray buffer to protect small, non-fish bearing streams when herbicides are aerially applied.
- Examples of State Actions Needed: 1) Riparian protections for non-fish bearing streams may suffice as a protective herbicide spray buffers assuming that the riparian protections extend the length of the non-fish bearing stream where spraying occurs; or 2) Adopt rules for aerial herbicide spray buffers for small, non-fish bearing streams; or 3) Voluntary approach that includes guidelines for buffer protections for aerial application of herbicides on non-fish bearing streams; Monitor and track voluntary measures using existing pesticide regulations; ~~Explore~~ Identify ODF and DEQ general authorities for enforcing changes in critical areas when voluntary measures are not implemented; . For all options include a 4) ~~R~~ revised ODF Notification of Operation form to explicitly include that aerial applicators will adhere to FIFRA labels, especially for herbicides that are prohibited from spraying in/above waterbodies, for all stream types, including non-fish bearing streams. **(All voluntary approaches need monitoring, tracking and identification of enforcement authorities that can be used if voluntary approach fails to achieve the desired results.)**